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Attorney for Defendant
VALERIAN CHIOCHIU

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	Case No. 2:17-CR-306-JCM-VCF
Plaintiff,)	EX PARTE APPLICATION TO CONTINUE
vs.)	SENTENCING DATE;
)	ORDER
VALERIAN CHIOCHIU (#12))	Current Date: June 18, 2021, at 11:00 a.m.
Defendants.)	Proposed Date: August 20, 2021 at 11:00 a.m.

Defendant Valerian Chiochiu by and through his counsel of record, Alan Eisner hereby applies *ex parte* to continue the present sentencing date. This application is based on the attached declaration of counsel Alan Eisner.

Respectfully submitted,
EISNER GORIN LLP

Dated: June 6, 2021

Alan Eisner

ALAN EISNER
Attorney for Defendant
VALERIAN CHIOCHIU

DECLARATION OF ALAN EISNER

I Alan Eisner declare as follows:

1. I am the attorney of record for defendant Valerian Chiochui and make this declaration in support of defendant's *ex parte* application to continue the present sentencing date of June 18, 2021 to August 20, 2021.

2. Defendant pled guilty pursuant to plea agreement on July 31, 2020, at which time sentencing and disposition was set for December 11, 2020. (Dkt 730.)

3. On October 23, 2020, this court continued the December 11, 2020, sentencing date to March 19, 2021. (Dkt. 756.) On October 29, 2020, the probation department disclosed its Presentence Investigation Report, which was revised and disclosed to the parties on February 12, 2021.

4. On March 10, 2021, pursuant to a stipulation between the parties, this court continued the March 19, 2021 sentencing date to the present sentencing date of June 18, 2021. (Dkt. 793.) The government filed its sentencing position on March 12, 2021. (Dkt. 798.)

5. Defense counsel makes this application because he is due to begin a homicide trial in Los Angeles Superior Court, Department 17 Long Beach, on June 8, 2021 in People v Wilson Lopez, NA101147. The Lopez trial is estimated to be 4-5 weeks in duration. In addition, defense counsel requires additional time to adequately prepare defendant's sentencing position and to adequately prepare for the sentencing hearing.

6. Government counsel has advised defense counsel that it takes no position on this application. The government further advised that it has spoken with both witnesses it intends to call at sentencing and this continuance does not cause them hardship.

Dated: June 6, 2021



Alan Eisner

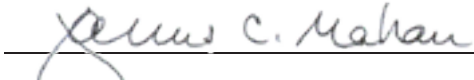
ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that good cause exists, taking into account the public interest in the prompt disposition of criminal cases.

Therefore, IT IS HEREBY ORDERED that:

The sentencing date is continued to August 6, 2021 at 10:00 a.m.

Dated: June 9, 2021



Honorable James C. Mahan
United States District Judge